

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:22-cr-00553-RLW-DDN
)	
RASHAUD L. COLLIER,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Nino Przulj, Special Assistant United States Attorneys for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, § 3141, et seq.

In further support, the United States of America states:

1. The Defendant faces a rebuttable presumption of detention because he is charged with: (a) Possession with intent to distribute Methamphetamine in violation of 21 U.S.C. § 841(a), an offense carrying a penalty of no more than twenty years' imprisonment; and, (b) Possession of a Firearm in Furtherance of Drug Trafficking in violation of 18 U.S.C. § 924(c), an offense carrying a minimum of five years' imprisonment.

2. In addition to the rebuttable presumption, the Defendant identifies as a Big Buckz gang member and the United States has learned that during his arrest this morning, February 2, 2023, during a protective sweep, police recovered two clear plastic bags of suspected narcotics –

one contained several gel capsules and the other a white, rocklike substance – underneath the bed shared by the Defendant and his girlfriend at his girlfriend’s mother’s house. Police also recovered a quart-sized clear plastic bag of suspected narcotics containing several white crystalline objects.

3. Given the above, there is a serious danger to the community that would be posed by Defendant’s release. Further, there are no conditions or combination of conditions pursuant to 18 U.S.C. §3142(c)(1)(B) that will reasonably assure Defendant’s appearance as required.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant’s initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Nino Przulj
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